

## AFFIDAVIT

I, Risk W. Bisher, of legal age and of sound mind hereby freely affirm to the following based on my personal knowledge:

1. I am the attorney of record for the plaintiff in this case.
2. Defendant has refused to engage in discovery and has filed a motion to stay discovery.
3. Where the vehicle was garaged and maintained is a material fact in this case.
4. Defendant's knowledge as to the location of the vehicle before the accident is relevant and a material fact.
5. Defendant's comptroller's affidavit states the vehicle was "temporarily" in Oklahoma, without defining that term. He does not address the issue that the tag on the vehicle was expired, that it was in Oklahoma for at least a year before the accident and that Oklahoma law would require the vehicle to be registered and tagged in Oklahoma after 60 days; these issues, among others need to be addressed when deposing Mr. Paul Foklette.
6. Defendant never advised the plaintiff or plaintiff's representative that his uninsured motorist claim was denied, only that it was excluding workers' compensation payments as duplicate payments under the policy.

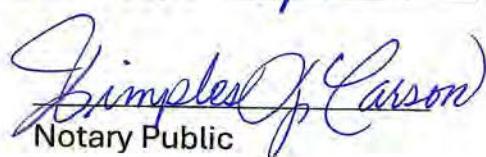
FURTHER AFFIANT SAYETH NOT.



Rick Bisher

STATE OF OKLAHOMA )  
                        ) ss  
COUNTY OF OKLAHOMA )

Subscribed and sworn to before me this 13th day of April in  
the year 2022.

  
Dimples J. Carson  
Notary Public

My Commission Expires 12/15/2022  
Commission no. 1011774

